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March 12, 2002

Attn: Angel L. Williamson, Senior Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00300921
Reference: Mid Year Report (1/1/01-6/30/01)

This memorandum is in response to your letter dated February 27, 2002 that was submitted due to concerns prompted by your review of the Mid Year Report (1/1/01-6/30/01):

"Best Efforts"

In response to your concerns regarding our "best efforts" to obtain the full name, mailing address, occupation and name of employer for contributors who exceed the \$200 threshold, the following procedures are performed:

- **Clear and Conspicuous Request**

All solicitations include an accurate and clear statement of the law's requirements for the collection and reporting of the above contributor information.

- **Follow-Up Requests Within 30 Days**

On a monthly basis, a report is generated that list all contributors who have contributed over \$200 at the completion of the month. This report is then reviewed and any contributors identified who did not provide the FEC required information are identified. A written follow-up request is then sent to the contributors who provided the incomplete information. All follow-up requests to contributors of more than \$200 include the following wording:

"To comply with Federal law, we must use best efforts to obtain, maintain, and submit the name, mailing address, occupation, name of employer of individuals whose contributions exceed \$200 per calendar year."

Since we file on a quarterly basis (bi-annually in nonelection years), most of the information obtained from our follow-up requests process is reported with the regularly scheduled report as oppose to requiring an alternate reporting mechanism. For information obtained from follow-up requests that are received subsequent to the related reporting date, our procedures are established to report this information in a memo Schedule A with the next regularly scheduled report. We believe these procedures are in compliance with the "best efforts" standard.

Schedule A-Omega List Company Receipt

The payments from Omega List Company, disclosed on Schedule A (Line 17), represent receipts from the rental of our mailing list to certain political organizations. We rent our mailing list at "usual & normal charge". The selling price for renting our mailing list is published and disclosed to all interested and approved parties. The price is set at a level to provided income to cover the expenses and costs associated with maintaining our mailing list.



Clarification of Consulting Fees/Consulting Expense

We have amended Schedule B of the Mid Year Report (1/1/01-6/30/01) to clarify the description of consulting fees/consulting expense. These fees primarily relate to work consisting of direct mail writing/designing and brochure/booklet writing. This amended report was filed electronically with your agency on March 8, 2002. The filing identification number assigned was 29308.

If you require any further information, please contact me at (202) 785-9619 or write me at the address shown below.

Sincerely,

C.E. Jones, Assistant Treasurer
Black America's PAC
2029 P Street, NW Suite 202
Washington, DC 20036

Federal Election Commission

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